REMARKS

Claims 1 - 15 and 29 - 31 are in the application.

The Examiner has objected to claim 30 under 37 C.F.R. 1.75(c) as being improper dependent form, for failing to further limit the subject matter of a previous claim. This objection is not understood. Claim 30 is in independent form – there is no "previous claim" from which Claim 30 depends. Applicant respectfully requests that the Examiner explain this claim objection so that the Applicant can respond appropriately.

Claims 1, 2, 14, 29 and 30 stand rejection under 35 U.S.C. 102(e) as being unpatentable over U.S. Patent 6,643,681 ("Saito"). This rejection is respectfully traversed, and reconsideration and withdrawal of the rejection are respectfully requested.

With respect to claims 1, 14, 29 and 30, the Examiner states that Saito discloses a system and method to generate a group of entities from a plurality of participating entities.

However, the applicant respectfully disagrees as follows: The teachings of Saito disclose a method of generating a network community by way of transmission of messages on similar subjects and topics by the users. Based on messages having subject matter on similar topics and subjects, the network community is automatically and spontaneously generated. In essence, the interest of the users to join the network community is drawn by the subject matter being discussed in the network community. Therefore, a potential user scans the various topics and subjects being discussed before transmitting a message on the interested subject or topic and becoming a part of the network community. Thus the potential user does not get accustomed to the existing users of the community

before joining the same, as the user joins the community on the basis of the subject or theme being discussed. In other words, the messages take the front stage and the users the backstage. (Please refer to Column 2 Lines 41 to 57 of Saito).

By way of further clarification, the Applicant's method is a "method to generate a group of entities from a plurality of participating entities" (Please refer to Claim 1), wherein the entities are waiting to be selected into groups by indication by other members or be selected to be the first member of a link of indications of a new group. Participating entities as such become familiar with each other and form "link of indications" based on indication of interests in meeting other participating entities and not on discussing similar subjects. (Please refer to page 2, lines 1, 2 and page 3, lines 17 and 18 of the Applicant's specification). The links formed lay the foundation for indication by added entities. The members in this case participate in indicating and generating more links of interest. The potential members get to know each other before joining the group. Thus, the key element that differentiates the method of establishing a group or community in the Applicant's and Saito's systems is the time point at which the entities/members get familiarized with each other. This is totally contrary to any teaching or suggestion in the reference.

With respect to Claims 1, 14, 29 and 30, the Examiner states that Saito discloses a method comprising one of said participating entities expressing by indication, which others of said participating entities they wish to meet.

The Applicant respectfully disagrees as follows: The teachings of Saito disclose a method whereby a potential user decides to become part of the network community on the basis of the subjects or topics being discussed and not

on the basis of preferences or interests in meeting a particular user. This is well

explained by the fact that the potential user reads the messages accumulated in

the message storing means of his CSW and decides to extend the message chain

by adding contents that he is aware of, thereby becoming part of the community.

The already existing users in the group have no influence in the inclusion of the

potential users. (Please refer to column 5, lines 23 to 52 of Saito).

In the Applicant's claimed method, the formation of a group is fashioned in

the form of a link, where each entity of the networking club is free to indicate any

other participating entity that he or she is interested in meeting. The group is

essentially expanded by the inclusion of entity/entities available in the set of

indications of the most recently included member entity of the group. Thus, the

already existing member entities have an absolute influence in the inclusion of

future entities. (Please refer to page 2, line 22, and page 3, lines 1 and 2 of the

Applicant's specification). Additionally, the set of indications of an entity, which

contribute to the expansion of the group, is based on a participating entity's

interest or preference in meeting a particular entity and not on the basis of similar

subjects or themes. This is expressly recited in Claim 1, where sub clause (a)

states "One of said participating entities expressing by indication which others of

said participating entities they wish to meet". Therefore, the Applicant's claimed

method differs from that of Saito's in (a) the direction of indicating preferences

(member entity towards participating entity in the Applicants' system and potential

user towards network community in Saito's patent) leading to the expansion of the

group or community and (b) selection of new member or entity being based on

interest in meeting a particular entity in the Applicant's system and based on

similar subjects in Saito's system. This is totally contrary to any teaching or suggestion in the reference.

With respect to Claims 1, 14, 29 and 30, the Examiner states that Saito discloses a method of selecting to be a first member of the group an entity, which has indicated at least one other of said participating entities it wishes to meet.

The Applicant respectfully disagrees as follows: According to Saito, the formation of the community is not initiated by a particular user, but by the synergy of a plurality of messages of highly similar content transmitted by potential users. Additionally, Saito teaches us that no special formalities are required to comply with for participation. (Please refer to column 2, lines 41 to 57 of Saito.)

According to the teachings of the Applicant, the first member is a participating entity of the networking club, which starts the group formation, as recited expressly in sub clause (b) of Claim 1 "selecting to be a first member of the group an entity which has indicated at least one other of said participating entities it wishes to meet". The first member's responsibility in the group generation is to add the second member through "indication" (Please refer to Page 3 Lines 13, 14 and 15 of the Applicant's specification). Accordingly, the express language of Claim 1, sub clause (b) is clearly not anticipated by the reference.

With respect to Claims 1, 14, 29 and 30, the Examiner states that Saito discloses a method where a new entity is added to the group by selecting the new entity from the set of indications of the last new member added to the group. The Applicant respectfully disagrees as follows: According to the teachings of Saito, addition of a new member of the community is totally voluntary and is achieved by the potential user sending a message of high similarity to the subject matter that is being discussed in the community. There are also no special formalities involved

for a potential user to join the community. (Please refer to column 2, lines 49 to 57 of Saito.)

Stated otherwise, in the Applicant's method, the selection of entities into groups is the result of following a chain of indication of interest of the participating members of the club and every entity gets a chance to select other members by indication immediately after joining the club. Therefore, the difference is that the recently included member entity in the Applicant's claimed method influences the inclusion of a new member into the group, whereas it is totally voluntary in Saito. This is perfectly in accordance with sub clause [c] of Claim 1, which states "adding a new entity to the group by selecting said new entity from the set of indications of the last member added to the said group". Accordingly, the express language of Claim 1, sub clause [c] is clearly not anticipated by the reference.

With respect to Claim 2, the Examiner states that Saito discloses that the set of indications of an entity are the set of other entities that said entity indicated is interested in meeting.

The Applicant respectfully disagrees as follows: The teachings of Saito disclose the formation of a cluster consisting of users bound by an interest in a certain common subject. These users inside a cluster are already full-fledged members of the network community and the logical path established is for communication between the users who have joined the community. A single user inside the cluster can opt to communicate with all the other users or a few selected users, depending on his or her choice.

According to the claimed invention, the set of indications of an entity are utilized to include more entities into the group as expressly stated in Claim 2 "the set of indications of an entity are the set of other entities that said entity indicated

it is interested in meeting". Thus the set of indications come into play for the continual expansion of the group, when the group is still being formed and do not belong to full-fledged members of the group. The Applicant submits that the set of indications in the Applicant's system is not equivalent to the logical path network in Saito. The difference to be highlighted in the formation of the group in the claimed invention is that the member entities forming a part of the group are aware of each other before formation, as represented by the set of indications rather than the users of the network community as depicted in Saito, where users become familiar with each other only after joining the group. This is totally contrary to any teaching or suggestion in the reference.

Claim 15 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Saito. This rejection is respectfully traversed, and reconsideration and withdrawal of the rejection are respectfully requested.

With respect to Claim 15, the Examiner states that though Saito does not specifically disclose that the entities are corporations or a combination of corporations and people, it is well known to one skilled in the art at the time of the invention that members of a group or community can be corporations or a combination of corporations and people.

The Applicant respectfully disagrees as follows: The Applicant's invention discloses a method of generating and expanding the group based on the set of indications of the member entities and more specifically by the recently joined member entity. The set of indications of an entity is the set of other entities the former entity is interested in meeting. The entities may be "corporations or a combination of corporations and people" as recited in Claim 15. An entity's interest in meeting other entities may arise from having a specific purpose or a

reason, for example an employer indicating to meet the employee and the employee indicating to meet the customer for business reasons or activities and not based on similar interests.

A key element that differentiates the Applicant's claimed method from the reasoning of a skilled person in the art is that the formation of the group of entities comprising corporations or a combination of corporations and people is actually for serving specific business or personal interests and not for the dissemination of corporate knowledge or expertise to be utilized by others. (Please refer to page 6, lines 3 to 7 of the Applicant's specification).

Therefore, the Applicant's system is clearly not obvious in light of the teachings of Saito.

Claim 3 stands rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent Publication No. 2003/0208727 ("Mortensen"). This rejection is respectfully traversed, and reconsideration and withdrawal of the rejection are respectfully requested.

With respect to Claim 3, the Examiner states that Mortensen discloses of a method, apparatus and a computer-readable medium enabling a computer to perform such method of grouping failed paths of an integrated circuit design into failed path sets. Furthermore, it states that it is obvious to one skilled in the art that the verification of whether an entry to a group has already been entered into the group to eliminate the redundancy of having duplicate entries of that entity.

The Applicant respectfully disagrees as follows: According to the teachings of Mortensen, the grouping of failed paths into the failed path sets stops when a node pattern is already part of the node pattern set and there are no more node patterns remaining. The Applicant submits that this method focuses on

listing the node patterns that are most likely to fail and then sorting them

exhaustively and including them in the node pattern set, so that no node pattern

remains ungrouped. The purpose of this is to form an exhaustive list of node

patterns, in such a way that there are no remaining node patterns left ungrouped.

(Please refer to Para 0046 – 0048 and the Abstract of Mortensen's application).

The Applicant, in his method of adding new members into the group does

not focus on exhaustively adding all the participating members into the group,

which is recited in Claim 3 ("adding new members until at least one indication of

the set of indications of the last new member added to said group includes one of

the current members of the group"). The system checks the set of indications of

the last new member added to the group. In case of the last new member having

multiple indications and in the event of one of the indications being a current

member of the group, the addition of members into the group will stop (Please

refer to page 3, lines 19, 20, 21 and 22 of the Applicant's specification). Moreover,

the verification of whether a new entity to be added has already been added to the

group is for stopping the group generation process. Furthermore, the Applicant

wishes to highlight that the purpose of the claimed invention is to form a circular

group where communication is meant to be in all directions and the efficiency of

the same is high, whereas the list generated according to the teachings of

Mortensen does not focus on communication.

Additionally, the Applicant wishes to respectfully highlight that Saito's

teachings are applicable to the field of network communities, whereas

Mortensen's teachings are in the field of digital electronics and integrated circuits,

which are not relevant to each other and therefore cannot be combined as being

obvious. Hence, the Applicants' system is clearly not obvious in light of the

combined teachings of Saito and Mortensen, since neither anticipates the claimed invention either alone or in combination.

Claims 4, 7 and 13 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Saito, in view of U.S. Patent Publication No. 2003/0167344 ("Danso"). This rejection is respectfully traversed, and reconsideration and withdrawal of the rejection are respectfully requested.

With respect to Claims 4, 7 and 13, the Examiner states that Danso discloses a method of organizing a multifunctional communications system beginning at a central entity and expanding further in a pyramidal structure, where the first entity connects with a first group of entities and the entities of the first group each are connected to each other. Furthermore, it states that it is obvious to one skilled in the art to validate the communication path from the initial node to the final node of the group through the interlinking nodes in-between them.

The Applicant respectfully disagrees as follows: According to the teachings of Danso, the multifunctional communications system discloses interconnected nodes formed in the shape of a pyramid with gradually increasing nodes at each subsequent lower communication level (Please refer to Para 0002 of Danso's application). The communication levels in the system are predetermined so as to prevent the formation of very large groups and minimize the usage of available resources. The limiting of the communication levels also limit the total number of nodes in the levels, as the structure of the pyramid is regular and symmetrical and the number of nodes can be derived mathematically. It is also stated that it is obvious to one skilled in the art to validate the communication path from the initial node to the final node of the group through the interlinking nodes in-between them.

According to the teachings of the Applicant, the look ahead and the look back methods are to systematically add the entities and hasten the process of group formation (Please refer to page 3, lines 23, 24, and page 4, lines 14, 15, 16 and 17 of the Applicant's specification). Generally, predetermination of communication levels or nodes involve mathematical calculations, but no mathematical calculations are employed here in the look ahead and look back methods. Moreover, the Applicant's system does not disclose any communication path from the first entity to the last entity and any validation of the communication path from the initial node to the final node. The purpose of having a link of indications between the entities is to individually add them to the group (Please refer to page 2, line 21 of the Applicant's specification). Once the entities are added to the group, the communication between them does not follow any fixed rule. Hence, the Applicant's system is clearly not obvious in light of the combined teachings of Saito and Danso, since neither anticipates the claimed invention either alone or in combination.

Claims 12 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Saito, in view of U.S. Patent Publication No. 2002/0141560 ("Khayatan"). This rejection is respectfully traversed, and reconsideration and withdrawal of the rejection are respectfully requested.

With respect to Claim 12, the Examiner states that Khayatan discloses that the entities under consideration are already pre-selected for in terms of having already indicated a common time and a common place to meet. Furthermore, it states that it would have been obvious to one skilled in the art to use common time and common place to meet to be considered to determine if one entity is viable as a group member.

The Applicant respectfully disagrees as follows: According to the teachings of Khayatan, time refers to the time slot or time period in which the members are interested in to use a particular sub-feature of the Group Establishment System (Please refer to Para 0080). Place refers to geographical scope for membership and is used by the Group Initiator to restrict people from specified places from joining the group.

According to the teachings of the Applicant and as expressly set forth in Claim 12 ("wherein the entities under consideration are already pre-selected for in terms of having already indicated a common time and a common place to meet), common time and common place refers to the time slots and the venue that entities gather in order to become members of the group. This is contrary to the teachings of Mortensen and therefore, the Applicant's system is clearly not obvious in light of the teachings of Khayatan.

The Examiner also apparently intended to reject Claims 5, 6, 8, 9, 10 and 11 over Saito in view of Danso, judging from the explanation provided paragraph 8 of the Examiner's Action spanning pages 7 and 8 of the Action. However, the rejection itself appears to have been inadvertently omitted from the Examiner's Action. Nevertheless, this putative rejection is also respectfully traversed, and reconsideration and withdrawal of the rejection are respectfully requested, based on the above comments.

Reconsideration, withdrawal of all rejections, and an early notice of allowance are respectfully solicited.